

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
GREENVILLE DIVISION**

Timothy Tangen,

Plaintiff,

v.

Fluor Intercontinental, Inc., et al.,

Defendants.

C/A No.: 6:21-cv-00335-JD

Marissa Brown,

Plaintiff,

v.

Fluor Intercontinental, Inc., et al.,

Defendants.

C/A No.: 6:21-cv-01427-JD

Shelby Iubelt, individually, on behalf of the
Estate of Tyler Iubelt, and as next friend of
V.I., minor,

Plaintiff,

v.

Fluor Intercontinental, Inc., et al.,

Defendants.

C/A No.: 6:21-cv-01420-JD

Lakeia Stokes,

Plaintiff,

v.

Fluor Intercontinental, Inc., et al.,

Defendants.

C/A No.: 6:21-cv-01086-JD

Maggie Bilyeu,

Plaintiff,

v.

Fluor Intercontinental, Inc., et al.,

Defendants.

C/A No.: 6:21-cv-01078-JD

Addie Ford,

Plaintiff,

v.

Fluor Intercontinental, Inc., et al.,

Defendants.

C/A No.: 6:21-cv-01159-JD

Marvin Branch,

Plaintiff,

v.

Fluor Intercontinental, Inc., et al.,

Defendants.

C/A No.: 6:21-cv-01083-JD

Julianne Perry, individually, on behalf of the
Estate of John Perry, and as next friend of L.P.
and G.P., minors,

Plaintiff,

v.

Fluor Intercontinental, Inc., et al.,

Defendants.

C/A No.: 6:21-cv-01250-JD

Haylee Rodriguez,

Plaintiff,

v.

Fluor Intercontinental, Inc., et al.,

Defendants.

C/A No.: 6:21-cv-01084-JD

India Sellers,

Plaintiff,

v.

Fluor Intercontinental, Inc., et al.,

Defendants.

C/A No.: 6:21-cv-01085-JD

Samuel Gabara,

Plaintiff,

v.

Fluor Intercontinental, Inc., et al.,

Defendants.

C/A No.: 6:21-cv-01007-JD

Chris Colavita,

Plaintiff,

v.

Fluor Intercontinental, Inc., et al.,

Defendants.

C/A No.: 6:21-cv-01017-JD

Robert Healy,
Plaintiff,

v.

Fluor Intercontinental, Inc., et al.,
Defendants.

C/A No.: 6:21-cv-01018-JD

**DEFENDANTS FLUOR
INTERCONTINENTAL, INC. AND
FLUOR GOVERNMENT GROUP
INTERNATIONAL, INC.'S NOTICE**

Defendants Fluor Intercontinental, Inc. and Fluor Government Group International, Inc. (collectively, “Fluor”) hereby file with this notice, as instructed by chambers, their dispositive motion from *Timothy Tangen v. Fluor Intercontinental, Inc., et al.*, C/A No.: 6:21-cv-00335-JD¹ in order to incorporate the arguments made therein for all of these consolidated cases. Plaintiffs’ counsel is aware of the Court’s instruction and this filing. Plaintiffs’ counsel has indicated they will file their response in opposition from *Tangen*² in the same manner so as to fully incorporate the arguments of the parties in all of these consolidated cases. Defendants will file additional dispositive motions by July 30, 2021 in accordance with the deadline set by the Court.

Respectfully submitted,

NEXSEN PRUET, LLC

s/Andrew A. Mathias

William W. Wilkins, Fed. ID No. 4662
Andrew A. Mathias, Fed. ID No. 10166
Konstantine P. Diamaduros, Fed. ID No. 12368
104 South Main Street, Suite 900 (29601)
Post Office Box 10648
Greenville, South Carolina 29603-0648
Telephone: 864.370.2211
Facsimile: 864.282.1177
BWilkins@nexsenpruet.com

¹ See *Tangen* at ECF No. 14.

² See *Tangen* at ECF No. 46.

AMathias@nexsenpruet.com
KDiamaduros@nexsenpruet.com

TREY GOWDY LAW FIRM, LLC

Harold Watson Gowdy, III, Fed. ID No. 5675
Post Office Box 3324
Spartanburg, South Carolina 29304
Telephone: 864.809.0917
tre@gowdytreylawfirm.com

HARTLINE BARGER LLP

Darrell L. Barger (*pro hac vice forthcoming*)
1980 Post Oak Blvd.
Suite 1800
Houston, Texas 77056
Telephone: 713.759.1990
Facsimile: 713.652.2419
dbarger@hartlinebarger.com

J. Reid Simpson (*pro hac vice forthcoming*)
800 N. Shoreline Blvd.
Suite 2000, North Tower
Corpus Christi, Texas 78401
Telephone: 361.866.8000
Facsimile: 361.866.8039
rsimpson@hartlinebarger.com

COVINGTON & BURLING LLP

Raymond B. Biagini (admitted *pro hac vice*)
Daniel L. Russell, Jr. (admitted *pro hac vice*)
One CityCenter
850 Tenth Street, NW
Washington, DC 20001
Telephone: 202-662-6000
Facsimile: 202-662-6291
Rbiagini@cov.com
DRussell@cov.com

*Attorneys for Defendants Fluor Intercontinental, Inc.
and Fluor Government Group International, Inc.*

July 28, 2021
Greenville, South Carolina